

The Honorable James L. Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

NWDC RESISTANCE and COALITION OF
ANTI-RACIST WHITES,

Plaintiffs,

v.

IMMIGRATION & CUSTOMS
ENFORCEMENT, MATTHEW T. ALBENCE,
in his official capacity as Acting Director of
Immigration and Customs Enforcement; and
KEVIN MCALEENAN, in his official capacity
as Acting Secretary of Homeland Security,

Defendants.

No. 3:18-cv-05860-JLR

**DECLARATION OF AMBIKA
KUMAR IN SUPPORT OF
PLAINTIFFS' MOTION TO SEAL**

Noted for Consideration: January 19,
2024

I, Ambika Kumar, declare as follows:

1. I am a partner in the law firm Davis Wright Tremaine LLP, counsel for
Plaintiffs. I make this declaration from personal knowledge.

2. On January 2, 2024, the deadline to file Plaintiffs' response to Defendants'
Motions in Limine, I called counsel for Defendants, Katie Fairchild. I explained that Plaintiffs
intended to file certain materials Defendants had designated as either "CONFIDENTIAL" or
"ATTORNEYS' EYES ONLY" under the Stipulated Protective Order (Dkt. 37), and that we
would seek an order sealing that information. Ms. Fairchild agreed to review the materials to
determine if Defendants would remove the designations.

1 I declare under penalty of perjury that the foregoing is true and correct.

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3 Executed this 2nd day of January, at Seattle, Washington.

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5 s/ Ambika Kumar

6 Ambika Kumar, WSBA #38237
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